

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 20, 2014 8:23:15 AM

---

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 20, 2014 7:18 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 07:18

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Sharon

Last Name: Charles

Title: Licensed Marriage and Family Therapist Associate

Organization you are affiliated with: Texas Association for Marriage and Family Therapists

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Marriage and Family Therapists which includes licensed marriage and family therapists as well as public members ensures that all LMFTs are well trained and adhere to high professional standards. The impact of LMFTs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Marriage and Family Therapists, Professional Counselors, and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

It appears that proper due diligence has not been completed prior to this recommendation. I seriously question whether the parties making these recommendations understand the depth of training Licensed Marriage and Family Therapists undergo to obtain licensure or the critical nature of the issues that our clients seek help for. If these factors were understood, I cannot fathom that a recommendation for oversight by those unlicensed and outside of our field would have been suggested. We are dedicated health professionals who obtain a high level training and commit to high ethical standards. To be viewed as anything less puts the public at risk and would be a failure by those commissioned to serve in the public's best interest. Please provide evidence of such due diligence to the public prior to voting on this issue.

Any Alternative or New Recommendations on This Agency: My recommendation is to keep the Marriage and Family Therapist licensure under its current agency.

My Comment Will Be Made Public: I agree